

Hearing Date and Time: December 6, 2011 at 10:00 a.m. (Prevailing Eastern Time)
Objection Date and Time: November 4, 2011

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,)	
)	Case No. 08-13555 (JMP)
Debtors.)	(Jointly Administered)
)	

**SUPPLEMENTAL OBJECTION AND JOINDER OF BNY MELLON CORPORATE
TRUSTEE SERVICES LIMITED IN SUPPLEMENTAL OBJECTION OF
LIQUIDATORS OF LEHMAN BROTHERS AUSTRALIA LIMITED TO NOTICE OF
PROPOSED ASSUMPTION OF EXECUTORY CONTRACTS AND UNEXPIRED
LEASES PURSUANT TO DEBTORS' THIRD AMENDED JOINT CHAPTER 11 PLAN
PURSUANT TO SECTION 1121 OF THE BANKRUPTCY CODE**

BNY Mellon Corporate Trustee Services Limited (“BNYM”), by its undersigned counsel, hereby files its Supplemental Objection and Joinder of BNY Mellon Corporate Trustee Services Limited in Supplemental Objection of Liquidators of Lehman Brothers Australia Limited to Notice of Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to Debtors’ Third Amended Joint Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code and states as follows:

1. BNYM is successor trustee under a certain Principal Trust Deed, dated 10 October 2002, between Dante Finance Public Limited Company and J.P. Morgan Corporate Trustee Services Limited (as amended and restated, the “Principal Trust Deed”) and certain

Supplemental Trust Deeds entered into in accordance with the Principal Trust Deed (collectively, the “Trust Deed”), including those referenced specifically in the LBA Supplemental Objection (as defined below).¹

2. On or about November 10, 2011, the Liquidators of Lehman Brothers Australia Limited (“LBA”), filed their Supplemental Objection to Notice of Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to the Debtors’ Third Amended Joint Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code (the “LBA Supplemental Objection”) [Docket No. 21904] in which LBA objected to confirmation of the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”) insofar as it provides for the assumption or assumption and assignment of certain contracts between Lehman Brothers Special Financing Inc. and (i) Saphir Finance Public Limited Co., (ii) Beryl Finance Limited, and (iii) Zircon Finance Limited.

3. At the direction of LBA given in accordance with the Trust Deed, the Trustee joins in the LBA Supplemental Objection and objects to confirmation of the Plan for the reasons set forth in the LBA Supplemental Objection.

¹ BNYM incorporates by reference the definitions used in the LBA Supplemental Objection.

Dated: November 10, 2011
New York, New York

Respectfully submitted,

REED SMITH LLP

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